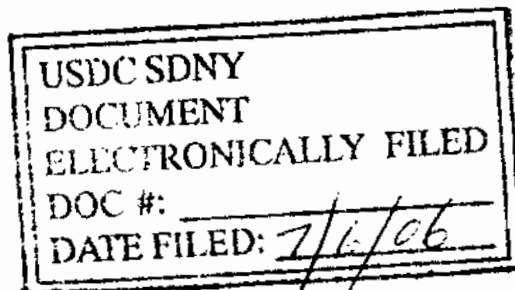


MEMO ENDORSED

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July 3, 2006

BY HAND

Hon. Lewis A. Kaplan
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1310
New York, NY 10007-1312

Re: *American Steamship Owners Mutual Protection and Indemnity Association, Inc. v. Alcoa Steamship Co. et al.*, 04 CV 4309 (LAK)

Dear Judge Kaplan:

We represent Defendants Keystone, BP, MTL, Kirby Inland Marine (as successor to Hollywood Marine Inc.), American Steamship Company, Amerada Hess, The Cleveland-Cliffs Steamship Company, Ispat, Sea Mobility, Alcoa Steamship Company, Inc., and related entities, and Sabine Towing & Transportation Co., Inc., as defined in their Answers and Counterclaims filed in the above-referenced action.

We write in regards to Defendants' pre-trial memorandum due by July 7, 2006 pursuant to your Honor's Order dated March 7, 2006, and the trial exhibits and affidavits which Defendants will be submitting pursuant to your March 7 Order.

The March 7 Order provided that "each side" submit one trial memorandum "not to exceed 35 pages." We represent several Defendants in this action and have been working jointly with numerous other Defendants in an effort to submit one trial memorandum which sets forth Defendants' positions with respect to the major issues in this case ("the main brief"). Due to the numerous amount of Defendants involved in this case, we respectfully request that the page limit for Defendants' "main brief" be extended to 50 pages. Further, certain Defendants have unique arguments which apply solely to them, and for which we are told they will request permission to file separate shorter briefs if your Honor so allows. We would ask your Honor to grant such requests (or further extend Defendants' page limit to accommodate such additional briefing).

PROSKAUER ROSE LLP

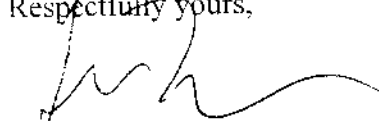
Hon. Lewis A. Kaplan

July 3, 2006

Page 2

We also request that your Honor, in order to accommodate Defendants' providing the Court on July 7 with hard copies of the trial exhibits and affidavits in this matter, grant permission for such documents to be delivered to your Honor's Clerk.

Respectfully yours,




Seth B. Schafner

cc: All Counsel of Record by e-mail

*Have had of not more
than 50 pages*

granted

SO ORDERED


LEWIS A. KAPLAN, USDO

7/6/06